REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1 and 3-16 are pending in this application. Claims 1, 3-9, and 11-16 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. patent 5,995,966 to <u>Kii et al.</u> (herein "<u>Kii</u>") in view of U.S. patent 5,880,445 to <u>Mori et al.</u> (herein "<u>Mori</u>"). Claim 10 was rejected under 35 U.S.C. § 103(a) as unpatentable over <u>Kii</u> as modified by <u>Mori</u> and further in view of U.S. patent 6,498,987 to <u>Kelly et al.</u> (herein "<u>Kelly</u>").

Initially, applicant and applicants' representative wish to thank the Examiners Lee and Caputo for the interview granted applicants' representative on September 23, 2004. During the interview the outstanding rejections were discussed in detail. Further, during the interview claim amendments were discussed to clarify the claims over the applied art. The present response sets forth the discussed claim amendments. During the interview the Examiners indicated that such claim amendments and comments appear to clarify the claims over the applied art.

Addressing the above-noted rejections, those rejections are traversed by the present response.

It is initially noted that each of the independent claims is amended by the present response to clarify features recited therein. More particularly, claim 1 is amended by the present response to recite:

a memory including a message table and plural word/phrase tables, the message table including an attribute column indicating an attribute and a corresponding message column storing message data for each attribute indicated in the attribute column, each of the plural word/phrase tables containing words and phrases corresponding to a respective attribute indicated in the attribute column in the message tables, the corresponding message data being acquired from the word/phrase tables[.]

The other independent claims 11 and 12 are similarly amended.

The above-noted features set forth in the claims are reflected in the original specification for example in Figures 3A-3G and Figure 4. With respect to Figure 4 in the present specification as a non-limiting example, in the claimed invention a message table (see for example Figure 3G) can be accessed and different attributes indicated therein can be checked to determine whether any appropriate message is provided corresponding to the different attributes. The different messages that can be stored with respect to the different attributes can be acquired from plural word/phrase tables. Each plural word/phrase table corresponds to a respective indicated attribute. With such an operation, a card that can have re-recordable information stored thereon can always have up-to-date information for each of different attributes. The claims as currently written set forth a specific data structure utilizing a message table and plural word/phrase tables corresponding to different attributes to allow the different attributes and corresponding word/phrase information to be readily available and to be easily placed onto the re-recordable message card.

The positively recited claim features are believed to distinguish over the applied art.

The outstanding Office Action cites the teachings in <u>Kii</u> to discloses the use of different tables in Figure 4 therein. However, applicants respectfully submit that <u>Kii</u> does not disclose or suggest the use of both the "message table" and the "plural word/phrase tables" as recited in the claims.

In addressing the limitations directed to the claimed "message table" and "plural word/phrase tables", the outstanding Office Action states:

5. Regarding applicant's arguments that Kii does not disclose or suggest the use of both a message table and plural word/phrase tables, examiner respectfully disagrees. As seen in Figures 3-4 and col 3, Kii does indeed teach the use of a memory that includes a message table (sentence pattern table) and plural word/phrase tables (sentence composition rule table and keyword attribute table, as well as user information databases 205-207), where the message creator accesses the message table and acquires at least one word or phrase corresponding to at least one attribute, and hence forms the

message with the acquired word or phrase as recited in independent claims 1, 11, and 12 and hence their dependent claims.

Further, in response to applicant's argument that the sentence pattern table in Kii does not correspond to the message table of the instant application, examiner respectfully disagrees. It is respectfully submitted that the sentence pattern table includes an attribute column in the form of the keyword column and a corresponding message column in the form of a sentence pattern column for storing message data for the attributes in the attribute column (i.e. keywords in the keyword column).

In response to applicant's argument that the keyword attribution table and the sentence composition rule table do not correspond to different attributes as clarified in the amended claims with the limitation "each plural word/phrase table corresponds to a respective attribute" examiner respectfully submits that each plural/word phrase table as embodied by the keyword attribution table and the sentence composition table does indeed correspond to a respective attribute since the word/phrase tables include rows with different respective attributes. It is respectfully submitted that a column (keyword column, with its rows "Event" and "Name") in the sentence pattern table does indeed correspond to the keyword attribution table and the sentence composition rule table because there are corresponding attributes listed in the rows of the table (i.e. the keyword attribution table contains "attributes" in the form of the row containing "Event" and its corresponding attributes such as date, weather, etc. and the row containing "Name" and its corresponding attributes such as sex, weather, etc., which are further defined and clarified in the sentence composition rule table rows for date and sex, etc.). 35 U.S.C. 103 rejection stands. See above.1

Applicants traverse the above-noted positions for the rejection as first the presently submitted claim amendments are believed to further clarify the claims over the applied art, and secondly the above-noted positions for the rejection do not appear to be properly considering each of the positively recited claim limitations.

In the Office Action the "sentence pattern table" in Figure 4 of <u>Kii</u> is noted as corresponding to the claimed "message table", and the "keyword-attribution table" and

¹ Office Action of April 6, 2004, pages 19-20, prenumbered paragraph 5.

"sentence composition rule table" are noted as corresponding to the claimed "plural word/phrase tables". Each of those positions is traversed as discussed below.

First, the noted "sentence pattern table" in <u>Kii</u> does not correspond to the claimed "message table". In the claims the "message table" includes an "attribute column and a corresponding message column for storing message data for each attribute indicated in the attribute column". The "sentence pattern table" in <u>Kii</u> does not have a such a structure. As clearly shown in Figure 4 in <u>Kii</u> the "sentence pattern table" merely contains one column for a "keyword" and one column for a "sentence pattern". Thus, the "sentence pattern table" does not include a column for an indicated attribute, and also does not include a corresponding message column storing message data for each attribute in the attribute column. The "keyword-attribution table" in Figure 4 of <u>Kii</u> does disclose different attribute columns, but that "keyword-attribution table" was not cited as corresponding to the claimed "message table", and also additionally does not include a corresponding message column showing message data for each attribute.

In maintaining the rejection on the above-noted basis, the Office Action states, as quoted above, "[i]t is respectfully submitted that the sentence pattern table includes an attribute column in the form of the keyword column and a corresponding message column in the form of a sentence pattern column for storing message data for the attributes in the attribute column (i.e. keywords in the keyword column)".

In response to that basis for the outstanding rejection, applicants note that in the keyword column of the sentence pattern table of Figure 4 of <u>Kii</u>, the keywords are "Event" and "Name". In the claims are currently written their must be a correspondingly labeled word/phrase table for each attribute indicated in the message table. Thus, for <u>Kii</u> to meet the claims limitations a separate word/phrase table would have to be provided and labeled with the keywords "Event" and "Name". However, it is clearly the case that <u>Kii</u> does not disclose

or suggest having a separate word/phrase table with the labels of the keywords "Event" and "Name". Thus, it is clearly the case that in the sentence pattern table in Figure 4 of <u>Kii</u> the items indicated under the keyword column are not attributes as required in the claims as they do not have corresponding word/phrase tables.

In such ways, the reliance on the teaching in <u>Kii</u> of the "sentence pattern table" does not meet the claimed limitations directed to the "message table".

Further, <u>Kii</u> does not disclose the "plural word/phrase tables" also required in independent claims 1, 11, and 12.

As recited in the claims "each plural word/phrase table corresponds to a respective attribute". It is clearly the situation that the "keyword-attribution table" and "sentence composition rule table" in Figure 4 of Kii do not correspond to different indicated attributes, and specifically noting that the different attributes are also indicated in an attribute column in the "message table". Stated another way, in Figure 4 Kii clearly does not teach or suggest a column in the "sentence pattern table" corresponding to the "keyword-attribution table" and "sentence composition rule table".

In contrast to the structure in <u>Kii</u>, in the "message table" shown as a non-limiting example in Figure 3G an attribute column is provided with a corresponding message, and the attributes in the attribute column are directed to different of plural word/phrase tables, see for example the word/phrase table directed to "class" in Figure 3B, the word/phrase table directed to "attendance" in Figure 3C, and the word/phrase table directed to "mark information" in Figure 3D. Again, in the claims the "message table" includes an attribute column with an attribute corresponding to the attribute from a respective of the plural word/phrase tables. Clearly that is not the situation in Figure 4 in <u>Kii</u>.

In addressing the above-noted features the outstanding Office Action indicates, as quoted above, that "[i]t is respectfully submitted that a column (keyword column, with its

rows "Event" and "Name") in the sentence pattern table does indeed correspond to the keyword attribution table and the sentence composition rule table because there are corresponding attributes listed in the rows of the table...".

In response to that basis for the outstanding rejection, applicants note that in the claims each attribute indicated in the message table has a corresponding word/phrase table. As noted above that is not the case in <u>Kii</u>. The claims do not indicate that a column in a sentence pattern table corresponds to a keyword attribution table. Instead, the claims set forth that each attribute indicated in the message table corresponds to a word/phrase table, which is clearly not the case in Kii.

It is also clearly the case that what is relied upon in <u>Kii</u> to meet the limitations of the plural word/phrase tables, namely the "keyword attribution table" and "sentence composition rule table", do not have corresponding entries in the "sentence pattern table" in <u>Kii</u>.

According to such a feature, and again with reference to Figure 3G in the present specification as a non-limiting example, the "message table" includes messages acquired from different word/phrase tables, i.e., the word/phrase tables in Figures 3B-3D as a non-limiting example. Kii clearly also does not teach or suggest such a feature. For Kii to teach such a feature Kii would need at the very least the indication of the "sentence pattern" in the "sentence pattern table" to contain messages obtained from the other "keyword-attribution table" and "sentence composition rule table". Kii does not teach or suggest that feature either.

In such ways, applicants respectfully submit that <u>Kii</u> does not disclose or suggest the features of the "message table" and "plural word/phrase tables" positively recited in each of independent claims 1, 11, and 12, and the claims dependent therefrom. Thus, each of the pending claims is believed to distinguish over the combination of <u>Kii</u> in view of <u>Mori</u>, and further in view of <u>Kelly</u>.

Application No. 10/084,047 Reply to Office Action of August 24, 2004

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND, MAIER & NEUSTADT, P.C.

Customer Number 22850

Tel: (703) 413-3000 Fax: (703) 413 -2220 (OSMMN 06/04)

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Gregory J. Maier Attorney of Record Registration No. 25,599

Surinder Sachar Registration No. 34,423